

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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CASTLE OIL CORPORATION, :

*Plaintiff,* :

*—against—* :

OLD REPUBLIC INSURANCE COMPANY, :

*Defendant.* :

**INITIAL DISCLOSURE**

Civ. Action No.: 08 CV 0990 (CLB)

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Pursuant to Fed. R. Civ. P. 26(a)(1)(A), plaintiff Castle Oil Corporation hereby furnishes its initial disclosure.

(i) The name, address, and telephone number of each individual likely to have discoverable information:

- (a) Paul Conley  
Senior Vice President and Chief Financial Officer  
Castle Oil Corporation  
500 Mamaroneck Avenue  
Harrison, New York 10528  
(914) 381-6661

Subjects: formation of contract of insurance; payment of premiums;  
communications with defendant; calculation of damages

- (b) James Niland  
J. M. Niland & Associates, LLC  
316 Fareway Lane  
Grand Island, New York 14072  
(716) 773-0182

Subjects: formation of contract of insurance; communications with  
defendant; communications with Murdock Claims Management Company ("Murdock"); handling of underlying claims  
and similar claims by defendant and Murdock

- (c) Michael Carrasquillo  
Claims Manager  
Castle Oil Corporation  
290 Locust Avenue  
Bronx, New York 10454  
(718) 579-3415

Subjects: circumstances of underlying claims; communications with Murdock; prior claims handling by defendant and Murdock

- (d) Timothy P. Tressy  
Murdock Claims Management Company  
present address and telephone number unknown

Subjects: handling of underlying claims and similar claims by defendant and Murdock; defendant's acceptance and later purported disclaimer of underlying claims

- (e) George M. Jones  
Old Republic Insurance Company  
Park 80 West, Plaza One  
Saddle Brook, New Jersey 07663  
(201) 845-7324

Subjects: formation of contract of insurance; defendant's acceptance and later purported disclaimer of underlying claims

- (f) Lawrence A. Levy, Esq.  
Rivkin Radler  
926 EAB Plaza  
Uniondale, New York 11556  
(516) 357-3000

Subject: defendant's purported disclaimer; communications with defendant and Murdock regarding purported disclaimer

(ii) Concurrently herewith, plaintiff is sending defendant's counsel a copy of each document in its possession, custody, or control which it currently contemplates using to support its claims.

(iii) The following is plaintiff's damages calculation, subject to revision based on facts and circumstances arising after commencement of this action:

DESCRIPTION	AMOUNT	DATE	CHECK NO.	SUBTOTAL
Settlement payment-Barbara Hickey and Lipsig, Manus & Moverman, as attorneys	\$ 50,000.00	07/09/2007	18857	
Settlement payment-Barbara Hickey and Lipsig, Manus & Moverman, as attorneys	175,000.00	08/22/2007	19694	
TOTAL DIRECT HICKEY SETTLEMENT PAYMENTS				\$ 225,000.00
ABN AMRO Bank	151,687.06	02/22/2007	19690	
Wachovia Bank	25,029.77	08/22/2007	19721	
First American Title Insurance Co. of NY	1,500.00	08/22/2007	19736	
Barbara Hickey	197,342.73	08/22/2007	19695	
First American Title Insurance Co. of NY	3,493.00	08/22/2007	19705	
Timothy Oberwerger	450.00	08/22/2007	19737	
Timothy Oberwerger	200.00	08/22/2007	19715	
TOTAL HICKEY PROPERTY ACQUISITION SETTLEMENT PAYMENTS				379,702.56
TOTAL HICKEY PROPERTY REHABILITATION AND MAINTENANCE COSTS				TBD
(PROCEEDS FROM SALE OF HICKEY PROPERTY)				TBD
Gabriel I. Pompe and Julia A. Vesi, and Filer and Ligattuta, as attorneys	30,937.50	09/08/2006	12576	
TOTAL DIRECT POMPE SETTLEMENT PAYMENTS				30,937.50
TOTAL ESTIMATED SUBROGATION CLAIM PAYMENTS	86,961.79			86,961.79

Dated: Harrison, New York  
April 18, 2008

s/ Michael M. Meadvin  
MICHAEL M. MEADVIN (MM-6366)  
Attorney for Plaintiff  
Castle Oil Corporation  
Post Office Box 466  
500 Mamaroneck Avenue  
Harrison, New York 10528  
(914) 381-6508

TO: Ira S. Lipsius, Esq.  
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New York, New York 10122